

## **EXHIBIT B**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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THE BASU GROUP INC.,	:	
	:	
	:	
<b>Plaintiff,</b>	:	<b>Civil Action No. 16-cv-00461-PGG</b>
	:	<b>ECF CASE</b>
<b>v.</b>	:	
	:	
SEVENTH AVENUE, INC.,	:	
	:	
<b>Defendant.</b>	:	
-----X		

**DECLARATION OF BHASKAR BASU  
IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT**

I, Bhaskar Basu, declare as follows:

1. I am the President of The Basu Group Inc. ("Basu Group"), Plaintiff in the above captioned Action, and am over the age of 18 years and competent to make this declaration.
2. I have personal knowledge of Basu Group's business, its business practices and its business records, and as such I make this declaration in support of Basu Group's Motion for Partial Summary Judgment.
3. Basu Group first started selling bags, purses, wallets and belts (collectively hereinafter "Items") bearing Plaintiff's Peacock Feather Design (as that term is defined in the Memorandum in Support of the Motion for Summary Judgment) in 2008.
4. In the calendar year 2008, Basu Group sold approximately 4,500 units of Items totaling gross sales over \$450,000.00.
5. In the calendar year 2009, Basu Group sold approximately 7,500 units of Items totaling gross sales over \$500,000.00.

6. In the calendar year 2010, Basu Group sold approximately 9,100 units of Items totaling gross sales over \$600,000.00.

7. In the calendar year 2011, Basu Group sold approximately 14,000 units of Items totaling gross sales over \$850,000.00.

8. In the calendar year 2012, Basu Group sold approximately 17,200 units of Items totaling gross sales over \$1,100,000.00.

9. In the calendar year 2013, Basu Group sold approximately 16,800 units of Items totaling gross sales over \$1,100,000.00.

10. In the calendar year 2014, Basu Group sold approximately 15,750 units of Items totaling gross sales over \$1,000,000.00.

11. In the calendar year 2015, Basu Group sold approximately 13,500 units of Items totaling gross sales over \$900,000.00.

12. In the calendar year 2016, Basu Group sold approximately 9,500 units of Items totaling gross sales over \$550,000.00.

13. Accordingly, over the nine (9) year period between 2008 and 2016, inclusive, Basu Group sold approximately 107,850 units of Items for total gross sales of over \$7,000,000.00.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 29<sup>th</sup> day of March, 2017 in Eden Prairie, MN, USA.

By: \_\_\_\_\_

Bhaskar Basu